



Brown Kwon & Lam LLP
Attorneys at Law
275 7th Avenue, Suite 701
New York, NY 10001
Tel.: (718) 971-0326
Fax: (718) 795-1642
Email: info@bkllawyers.com

Writer's Direct: clam@bkllawyers.com
(646) 249-5578

Via ECF

April 22, 2020

The Honorable Lewis J. Liman, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street, Room 701
New York, NY 10007

Re: *Perovic v. Lovelace Tavern, LLC, et al.*
Case No.: 20-cv-1340(LJL)

Dear Judge Liman,

We write, on behalf of Plaintiff, to respectfully request (1) an extension of time to serve a copy of the Summons and Complaint on Defendants and (2) an adjournment of the Initial Pretrial Conference, currently scheduled for May 20, 2020 at 3:00pm.

Pursuant to F.R.C.P. 4(m), the time limit for service of a summons and complaint is ninety (90) days unless plaintiff is able to show good cause. Plaintiff's Complaint was filed on February 14, 2020, and service of process must be completed by May 14, 2020. Due to the COVID-19 pandemic and temporary closures of non-essential businesses since mid-March, Plaintiff is unable to timely serve Defendants as closures have now been extended until May 15, 2020. Furthermore, Defendants' restaurants are temporarily closed.

Therefore, Plaintiff respectfully requests until July 31, 2020 to complete service of the Summons and Complaint, and respectfully requests an adjournment of the Initial Pretrial Conference until a time after Plaintiff's deadline to complete service of process. Plaintiff was unable to obtain Defendants' consent as no attorney has appeared on their behalf.

Thank you for your time and consideration.

Respectfully Submitted,

/s/ *Clara Lam*
Clara Lam, Esq. (CL6399)

GRANTED. The initial pretrial conference is adjourned to August 4, 2020 at 4:30 p.m.

SO ORDERED. 4/29/2020.

A handwritten signature of Lewis J. Liman in black ink.

LEWIS J. LIMAN
United States District Judge